

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: January 10, 2012

VICTOR N. ROVANI III : VIOLATIONS:

29 U.S.C. § 501(c) (embezzlement of union funds – 3 counts)

18 U.S.C. § 1014 (false statement on loan and credit application – 1 count)

29 U.S.C. § 530 (deprivation of union member's rights pertaining to internal labor union affairs – 2 counts)

I N D I C T M E N T

COUNTS ONE THROUGH THREE

THE GRAND JURY CHARGES THAT:

1. The United Brotherhood of Carpenters and Joiners of America Metropolitan Regional Council of Philadelphia and Vicinity ("Council"), and the Wharf and Dockbuilders and Piledrivers Local 454 ("Local 454" or "Union") are "labor organizations" located in Philadelphia that engaged in industry affecting interstate commerce and are subject to the Labor Management Reporting and Disclosure Act.

2. At all times relevant to this indictment, defendant VICTOR N. ROVANI III was employed by the Council as the business representative of Local 454.

3. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, defendant

VICTOR N. ROVANI III

embezzled, stole, and unlawfully and willfully abstracted and converted to his own use, moneys

and funds of Local 454, in that, without authorization, he caused and accepted check disbursements made from funds in the bank accounts of Local 454 for his own personal benefit as follows:

COUNT	DATE	ACCOUNT	CHECK NUMBER	AMOUNT
1	March 13, 2009	Citizens Bank General Fund	15510	\$1,950.00
2	July 29, 2009	TD Bank General Fund	1018	\$1,997.00
3	December 15, 2009	TD Bank Industry Advancement Program	1021	\$4,375.00

All in violation of Title 29, United States Code, Section 501(c).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, TD Bank, National Association (“TD Bank”) was a financial institution located in Philadelphia, Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation, Certificate No. 18409.
2. On or about March 25, 2009, in the Eastern District of Pennsylvania, defendant

VICTOR N. ROVANI III

knowingly made and caused to be made to TD Bank a false statement for the purpose of influencing the actions of TD Bank, in that the defendant caused to be submitted to that bank a false credit card application for a VISA credit card ending in 7717 in which the defendant represented that Local 454, through its governing body, had authorized him to execute a credit card account agreement with TD Bank, when, as the defendant knew, he had no authorization to obtain a credit card on behalf of Local 454.

In violation of Title 18, United States Code, Section 1014.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 18, 2010, in Philadelphia, in the Eastern District of Pennsylvania, the defendant

VICTOR N. ROVANI III

did unlawfully and willfully through the use of force or violence, or threat of the use of force or violence, restrain, coerce, or intimidate and attempt to restrain, coerce or intimidate M.D., a member of Local 454, for the purpose of interfering with or preventing the exercise of rights to which M.D. was entitled under the provisions of Section 411 of Title 29, United States Code, that is, the right to participate in union affairs and the right to express his views, arguments, or opinions, in that defendant ROVANI physically and verbally threatened M.D. during a membership meeting of Local 454..

All in violation of Title 29, United States Code, Section 530.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 16, 2010, in Philadelphia, in the Eastern District of Pennsylvania, the defendant

VICTOR N. ROVANI III

did unlawfully and willfully through the use of force or violence, or threat of the use of force or violence, restrain, coerce, or intimidate and attempt to restrain, coerce or intimidate M.D., a member of Local 454, for the purpose of interfering with or preventing the exercise of rights to which M.D. was entitled under the provisions of Section 411 of Title 29, United States Code, that is, the right to participate in union affairs and the right to express his views, arguments, or opinions, in that defendant ROVANI physically and verbally threatened M.D. during a membership meeting of Local 454.

All in violation of Title 29, United States Code, Section 530.

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney